

From: [Dan Peacock](#)
To: [John Lublinkhof](#)
Cc: [Russell Wasem](#)
Subject: Re: Fwd: Re: Mitigation - Liquid Concentrate
Date: 12/14/2010 10:44 AM

Dear Mr. Lublinkhof,

- At the time of the RMD I had thought that the 4 lb was high but had forgotten that we had worked out a reasonable accommodation.
- The figures that you proposed make perfect sense. I probably had been consulted but forgot about it over the past 2 years.
- Thank you are supplying the documentation.
- I apologize for the error on my part.

Dan

▼ "John Lublinkhof" ---12/13/2010 04:48:50 PM---Dear Dan, Thanks for sending the amendment requirements for Ligua-Tox II EPA Reg.

From: "John Lublinkhof" <jlublinkhof@belllabs.com>
To: Dan Peacock/DC/USEPA/US@EPA
Date: 12/13/2010 04:48 PM
Subject: Fwd: Re: Mitigation - Liquid Concentrate

Dear Dan,

Thanks for sending the amendment requirements for Ligua-Tox II EPA Reg. No. 12455-61. I asked the question about the liquid product and the issue of size restrictions. I received the below e-mail for Rusty Wassem explaining how the sizes were derived. As a consequence, I used this to set the minimum of 8 packs x 1.68 fl oz. which is shown on the label. I'll send the label as an attachment to your recent e-mail.

Best regards,

John Lublinkhof

-----Original Message-----

From: Wasem.Russell@epamail.epa.gov
To: "John Lublinkhof" <jlublinkhof@belllabs.com>
Date: Thu, 23 Oct 2008 10:51:37 -0400
Subject: Re: Mitigation - Liquid Concentrate

Good Morning John,

We have discussed your request for clarification on how the mitigation measures apply to concentrate rodenticide products.

Since the product in question (12455-61) is a concentrate, we will permit this product to be sold in sizes that are equivalent to 4lbs of ready-to-use dry bait product. This 4lb equivalent will be required for all 1st generation anticoagulant concentrate products, with an 8lb equivalent being required for 2nd generation anticoagulant concentrate products.

Using this equivalent, 12455-61 must be sold in packages containing no fewer than 8 - 1.68fl oz pouches. We calculate that since the minimum rat placement for liquid baits is 16oz of liquid (= ½ package), the minimum package size for the concentrate must be 16X of ½ package or 8 packages or 13.44oz (1.68oz x 8 packages).

Please let me know if you have any further questions. Also, our correspondence on this matter will be added to the docket. Please let me know if you have any objections.

Regards,

Rusty_____

Rusty Wasem
Chemical Review Manager
Reregistration Branch I
Special Review & Reregistration Division
(703)305-6979

"John

Lublinkhof"

To <jlublinkhof@bel
llabs.com> Russell
Wasem/DC/USEPA/US@EPA

cc 09/30/2008

03:52

PM

Subject

Mitigation - Liquid

Concentrate

Dear Rusty,

Good Afternoon.

We have submitted amendment requests to the Registration Division for all but one of our products to comply with the final mitigation decision. The one remaining product I am struggling with is Liquatox II

(EPA Reg. No. 12455-61) which is a liquid concentrate of sodium salt of diphacinone).

I refer to the table on page 36 of the final mitigation decision. We understand the restrictions (not to be used in human residences, indoor

use only etc.) However, the 4 lb. minimum size requirement is not practical. Currently, professionals and farmers are able to purchase 1.68 oz. pouches individually (each is mixed with a quart of water) to use in special situations, namely grain elevators and food storage facilities etc. In these types of sites, food is readily available and rats and mice are not easily attracted to solid baits. The use of a liquid is ideal in such situations since since rats and mice are very attracted to such for their water needs especially in these dry environments. A 4 lb. size requirement equates to approximately 37 pouches. This is a very undesirable size when the individual pouches are

not allowed for individual sale. A acceptable and desirable size would be a package of 6 to 8 pouches.

Is there a way possible that the minimum size requirement can be

changed

to allow continued sale and use of this important specialized product?
Please advise. I am looking forward to your input and suggestions.

Thanks,

John Lublinkhof, Ph.D,
Director of Regulatory Affairs
Bell Laboratories, Inc.
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